

## Giselle Cornejo

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**From:** Maria Turner <maria.turner@nelsonmullins.com>  
**Sent:** Tuesday, January 14, 2020 11:41 AM  
**To:** David Rheingold  
**Cc:** Richard North; Giselle Cornejo  
**Subject:** RE: Bard IVC Filter- Robert Pierro- 2:16-cv-02798

Yes—at the Court’s request, Exhibits B and F were combined, so I’m not sure which letter will ultimately be cited in the report- but the case is on that list.

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**From:** David Rheingold <drheingold@Rheingoldlaw.com>  
**Sent:** Tuesday, January 14, 2020 11:38 AM  
**To:** Maria Turner <maria.turner@nelsonmullins.com>  
**Cc:** Richard North <richard.north@nelsonmullins.com>; Giselle Cornejo <gcornejo@Rheingoldlaw.com>  
**Subject:** FW: Bard IVC Filter- Robert Pierro- 2:16-cv-02798

Maria:

Just to confirm, does this email mean by “updating” that Pierro is now on Exh F?

Thanks

Dave

DAVID B. RHEINGOLD

**RHEINGOLD GIUFFRA RUFFO & PLOTKIN LLP**

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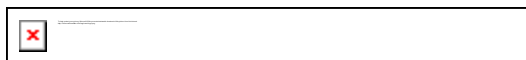
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**From:** Maria Turner [<mailto:maria.turner@nelsonmullins.com>]  
**Sent:** Tuesday, January 14, 2020 10:54 AM  
**To:** Richard North <[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)>; David Rheingold <[drheingold@Rheingoldlaw.com](mailto:drheingold@Rheingoldlaw.com)>  
**Subject:** RE: Bard IVC Filter- Robert Pierro- 2:16-cv-02798

Hi David-

Our dbase was midcoded. I double checked the complaint and have updated both the dbase and the exhibit.

Thanks,  
Maria



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MARIA BRANCH TURNER **PARALEGAL COORDINATOR**  
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Begin forwarded message:

**From:** David Rheingold <[drheingold@Rheingoldlaw.com](mailto:drheingold@Rheingoldlaw.com)>  
**Date:** January 14, 2020 at 10:02:49 AM EST  
**To:** Richard North <[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)>  
**Cc:** Giselle Cornejo <[gcornejo@Rheingoldlaw.com](mailto:gcornejo@Rheingoldlaw.com)>, "RLopez@lopezmchugh.com" <[RLopez@lopezmchugh.com](mailto:RLopez@lopezmchugh.com)>, "Mark O'Connor (BG)" <[moconnor@beusgilbert.com](mailto:moconnor@beusgilbert.com)>, Jessica Galentine <[jgallentine@beusgilbert.com](mailto:jgallentine@beusgilbert.com)>, Julia Reed Zaic' <[julia@hrzlaw.com](mailto:julia@hrzlaw.com)>, Christina Natale <[Christina@heardlawfirm.com](mailto:Christina@heardlawfirm.com)>, "mwass@lopezmchugh.com" <[mwass@lopezmchugh.com](mailto:mwass@lopezmchugh.com)>  
**Subject:** Bard IVC Filter- Robert Pierro- 2:16-cv-02798

◀External Email▶ - From: [drheingold@Rheingoldlaw.com](mailto:drheingold@Rheingoldlaw.com)

Richard,

Our client Robert Pierro (2:16-cv-02798) is currently listed in Amended Exhibit I, along with other cases lacking federal jurisdiction. Our client is an NJ resident, but we only filed against Bard Peripheral Vascular. We believe diversity of citizenship exists in this case. We request that Pierro be moved to Exhibit F and it's remand venue be listed as District Court of New Jersey.

Feel free to call.

Best,

Dave

DAVID B. RHEINGOLD

**RHEINGOLD GIUFFRA RUFFO & PLOTKIN LLP**

551 Fifth Avenue, 29<sup>th</sup> Floor, New York, NY 10176 [drheingold@rheingoldlaw.com](mailto:drheingold@rheingoldlaw.com)  
tel 212-684-1880 | 800-349-0004 | fax 212-689-8156 | <http://www.rheingoldlaw.com>



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